

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT T. ROETHLE,

Defendant.

No. 4:21-CR-000465 RLW (SRW)

DEFENDANT’S MOTION FOR REQUEST TO TRAVEL

Comes now Defendant Scott T. Roethle, by and through Counsel Neil J. Bruntrager of Bruntrager & Billings, P.C., and respectfully requests this Honorable Court to allow Defendant to travel to Park City, Utah on Saturday, December 4, 2021, with his family during his children’s school winter break. In support of this motion, Defendant states as follows:

1. If permitted, Defendant, with his wife and three children, will be leaving his home in Leawood, Kansas on Saturday, December 4, 2021, and flying to Park City, Utah.

2. Defendant and his family will be staying at Rvcs The Miner Club located at 4070 North Willow Draw, Park City, Utah, 84098.

3. Defendant will be returning to his home in Leawood, Kansas on Saturday, December 11, 2021.

4. Defendant has attached a copy of his flight itinerary and hotel reservation confirmation for this Court’s reference.

5. Defendant's travel dates will not interfere with any currently scheduled hearing dates.

Wherefore, Defendant moves this Court to allow him to travel to Park City, Utah for a family vacation, leaving on Saturday, December 4, 2021 and returning on Saturday, December 11, 2021, and for such other and further relief as this Court deems just and proper.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager
Neil J. Bruntrager, #29688
225 S. Meramec Ave., Suite 1200
Clayton, MO 63105
(314) 646-0066
(314) 646-0065-facsimile
njbatty@aol.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of November, 2021, the foregoing **Motion for Request to Travel** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager